

Robert Alexander

From: Robert Alexander
Sent: Monday, March 02, 2015 12:57 PM
To: 'Jason Winningham'
Cc: metant1@comcast.net; Dana Waits; Patrick Parker
Subject: RE: FW: TN Valley Recycling LLC-NPDES Permit TN0080063-Consent Order WPC12-0130
Attachments: Letter to TDEC RE testing.pdf

Jason and Mike,

In reviewing the sampling data referenced in your January 13 letter, along with the laboratory analytical data which you provided for the 6 samples, we offer the following comments:

The tabulated summary of PCB monitoring since April 2014 does not correspond with the sampling dates and analytical recently forward with laboratory data sheets:

- April 18, 2014 laboratory data was submitted, but is not shown on spreadsheet.
- Analytical data has not been reviewed for samples from September to December 2014.

Our QA/QC review has determined that 3 of the 6 samples are deemed unacceptable (April 7, May 29, and June 4) – a separate letter will address this.

For the three remaining acceptable samples (April 1 and 18, and June 10). For the three samples shown on the Jan 13th spreadsheet, (10/13, 11/17, and 12/3), please provide these laboratory data sheets. Once we have reviewed that data, we can provide a full response to your request of January 13th.

It is quite possible that, with the fall data, that TVR will have attained the 6-sample of non-detect data we are seeking, and that resumption of the quarterly sampling frequency is granted. But we must first ensure that the QA/QC records will verify that.

Bob Alexander
NPDES Permit Writer
Division of Water Resources
TN Dept. of Environment and Conservation
615-532-0659 office
615-519-7787 cell
Robert.alexander@tn.gov

We accept and encourage electronic document submittals.

From: Jason Winningham [<mailto:jason@indenvconsultants.com>]
Sent: Wednesday, February 11, 2015 10:25 AM
To: Robert Alexander
Subject: Re: FW: TN Valley Recycling LLC-NPDES Permit TN0080063-Consent Order WPC12-0130

Thanks. We will collect the samples the next rain/discharge. The holding time for TSS and PCB are 7 days, so we have that to determine whether to run them once they are collected.

jkw

On Wed, Feb 11, 2015 at 8:44 AM, Robert Alexander <Robert.Alexander@tn.gov> wrote:

Found it – lost in the weeds. Will look at it this week and get back to you. How soon until you have to decide on the next sampling round?

Bob Alexander

NPDES Permit Writer

Division of Water Resources

TN Dept. of Environment and Conservation

615-532-0659 office

615-519-7787 cell

Robert.alexander@tn.gov

We accept and encourage electronic document submittals.

From: Pam Holt [mailto:pam@indenvconsultants.com]

Sent: Thursday, January 15, 2015 1:10 PM

To: Robert Alexander; Jessica Murphy

Cc: Solomon Miller; Jason Winningham; Michael Tant

Subject: TN Valley Recycling LLC-NPDES Permit TN0080063-Consent Order WPC12-0130

*** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - OIR-Security. ***

Attached are the supporting Chain of Custody and laboratory results for the monitoring results from April-December 2014 for the Consent Order for TN Valley Recycling, LLC, NPDES Permit TN0080063.

Please let us know if you need any additional information.

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Pamela Holt, Office Manager

Industrial Environmental Consultants, LLC

2603 Fessey Park Road
P.O. Box 40066
Nashville, TN 37204

Phone: 615-730-5059 / Fax: 615-730-9278

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Jason Winningham, P.E.
Industrial Environmental Consultants, LLC
PO Box 40066
2603 Fessey Park Road
Nashville, TN 37204
work: 615-730-5059
cell: 615-495-4369
fax: 615-730-9278

TVR

DRAFT WORDING – RESPONSE ON PCB DATA SET

In response to the inquiry by Industrial Environmental Consultants submitted on your behalf, we provide the following responses:

Issue 1: *The consent order for TVR WPC12-0130 requires monthly testing for TSS and PCB for 2 years or until 6 consecutive months of samples are in substantial compliance with the permit limits (95% or more). We have completed six months of monthly sampling. All PCB results were Non-Detect and this condition is met.*

Response: TDEC has identified, with the assistance of the TN Dept. of Health Laboratory, concerns with the laboratory analyses and the quality assurance/quality control. These concerns render data submitted for the April 15, 2014 and June 7 and 13, 2014 as unacceptable to show compliance with the Consent Order.

After reviewing the data you submitted, the following points were noted:

- 1) Custody seal questions remain. The engineering firm checked off the boxes on their own COC's that custody seals were present; however the laboratory checked off that they did not exist. At least one set of samples arrived above the required temperature.
- 2) Throughout the time period submitted, no sample contained enough submitted volume to conduct QC on that sample. A MS/MSD failure in of itself may or may not invalidate the data, however if there is no MS/MSD data for a sample set/site, it makes evaluating recovery, especially low recovery or no recovery as we have in this case difficult.
- 3) Three of the submitted packages indicate that the samples were extracted outside the method 608 requirement of 7 days. The packages in question are as follows:
 - a. Test America Job ID 490-54629-1. Date Collected 06/04/14 @ 19:15; prepared 06/13/14 @ 09:51
 - b. Test America Job ID 490-50338-1. Date Collected 04/07/14@00:54; Prepared 04/15/14 @ 16:17
 - c. Test America Job ID 490-54116-1. Date Collected 05/29/14 @ 13:56; Prepared at 06/07/14@06:55

In summary, three of the six samples you submitted under the Consent Order are acceptable (April 1, April 18, and June 10) and the remaining 3 are not. To attain compliance with the Order, TVR must provide data collected over 6 consecutive months a total of six (6) samples reflecting that Total PCBs were not detectable at a concentration of 0.5 ug/l. This requirement remains in effect.

Issue 2: *The average TSS results for samples during this period is <95% of the permit limit of 40 mg/L. Is this the correct way to determine compliance with this condition?*

Response:

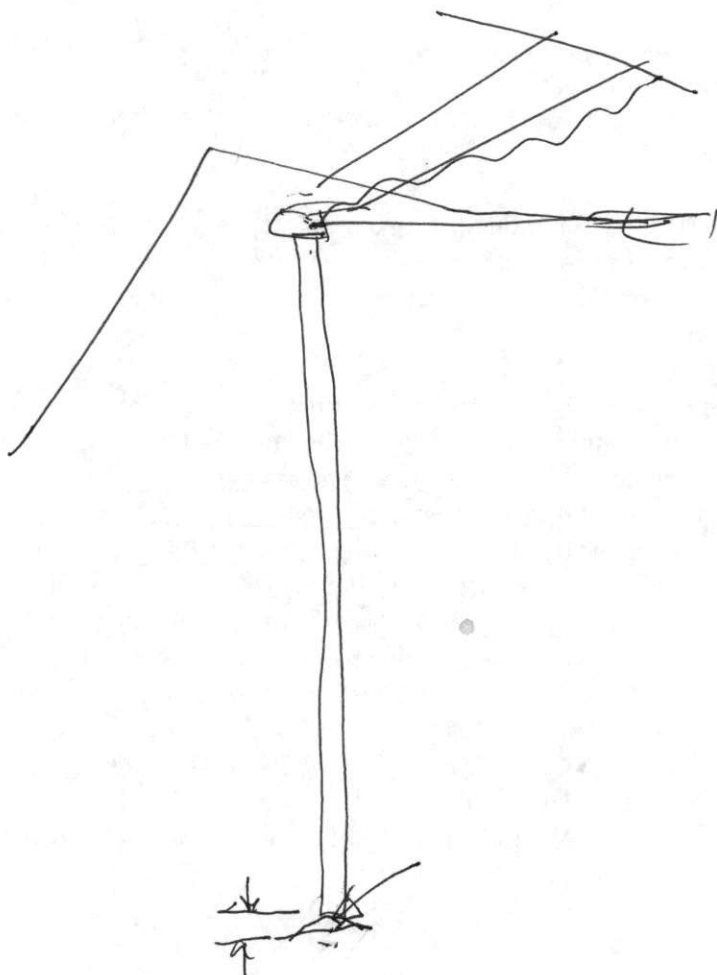
Issue 2: How would you like TVR to notify TDEC of completion of this condition and that they will begin testing on a quarterly basis for PCB and TSS?

Response:

Issue 2: Should TVR obtain a new DMR form?

Response:

SWT





Tennessee Valley Recycling, LLC

P.O. Drawer H
Decatur, Alabama 35602
Telephone (256) 353-6351

www.TVRLLC.com

1300 Highway 20 West
Decatur, Alabama 35601
Fax (256) 351-9246

January 13, 2015

VIA EMAIL TO:

~~Robert Alexander~~ (~~Robert.Alexander@tn.gov~~)
Jessica Murphy (jessica.murphy@tn.gov)

Dana: ?

Tennessee Dept. of Environment & Conservation
Division of Water Resources
401 Church Street
L&C Annex 6th Floor
Nashville, Tennessee 37243-1534

RE: Tennessee Valley Recycling, LLC – Pulaski, TN
NPDES Permit TN0080063 / Consent Order Case Number WPC12-0130

Dear Tennessee Department of Environment and Conservation:

Tennessee Valley Recycling is submitting the following for your review and approval to fulfill the monitoring requirements of discharges under Paragraph 2 of the above referenced Consent Order. Attached is a tabulated summary of PCB and TSS monitoring completed at the subject facility since April 2014. The facility has been testing both parameters on a monthly basis (when a discharge occurs) as required by the Order.

The Order states that monthly testing is required for two years or until 6 consecutive months of samples are in substantial compliance with permit limits (95% or more). PCB has not been detected in the 7 samples collected during the 6 monitoring periods, and meets the Consent Order requirement. The average of TSS during the monitoring period is 25.7 mg/L, which is less than 95% of the 40 mg/L permit limit.

TVR requests TDEC accept these results and allow TVR to continue testing for TSS and PCB on a quarterly basis as required by the NPDES Permit.

If you have any questions please do not hesitate to contact me.

Sincerely,

Tennessee Valley Recycling, LLC

Solomon I Miller
Chief Manager of Administration

Enclosure

**TENNESSEE VALLEY RECYCLING, LLC
PULASKI SCRAP – 001**

**RESULTS FOR TSS & PCB
APRIL – DECEMBER 2014**

DATE	TSS (mg/L)	PCB (ug/L)
4/1/14	3.40	<0.50
4/7/14	10	<0.50
4/18/14	---	---
5/29/14	3.5	<0.50
6/4/14	53 ¹	<0.50
6/10/14	61 ²	---
09/02/14	---	---
10/13/14	46 ³	<0.50
11/17/14	19	<0.50
11/28/14	---	---
12/3/14	9.7	<0.50
12/29/14	---	---
Average	25.7	<0.50

¹Collected during a rain event with total rainfall of 4.81 inches, the water in the pond rose so rapidly the large pumps started – reason for high TSS.

²Filters were not changed between this and the previous discharge.

³Confident that large pumps came on for some reason causing elevated TSS.

Note: No Discharge in July & August

INDUSTRIAL ENVIRONMENTAL CONSULTANTS, LLC.

Environmental Engineers & Consultants
2603 Fessey Park Road • P. O. Box 40066
Nashville, TN 37204

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